



FAIR POLITICAL PRACTICES COMMISSION

428 J Street • Suite 620 • Sacramento, CA 95814-2329
(916) 322-5660 • Fax (916) 322-0886

August 25, 2009

Ara Najarian

REDACTED

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RE: FPPC No. 06/111; Ara Najarian

Dear Mr. Najarian:

The Fair Political Practices Commission ("Commission") enforces the provisions of the Political Reform Act (the "Act") found in Government Code Section 81000, and following. As you are aware, the Commission received a complaint against you alleging that you violated conflict of interest provisions of the Act. These allegations referred to your vote regarding property at 500 N. Central Avenue while a member of the Glendale City Council on November 8, 2005. The Commission has decided to close this case without further action.

The complaint alleged that when you voted to amend the agreement regarding the property where you lease your office space, you had a conflict of interest. Our investigation revealed that even though your economic interest (i.e. your leasehold interest) was directly involved in the governmental decision, the presumption of materiality was rebutted since it was not reasonably foreseeable that the governmental decision would have any effect on the factors listed in Regulation 18705.2, subdivision (a)(2)¹. Therefore, we are closing this case without finding a violation.

The Commission publishes forms and manuals to facilitate compliance with the provisions of the Act, so if you need forms or manuals, or guidance regarding your obligations, please call the Commission's Technical Assistance Division at 1-866-275-3772. Please also visit our website at www.fppc.ca.gov.

Sincerely,

REDACTED

Galena West
Senior Commission Counsel
Enforcement Division

¹ The factors of Regulation 18705.2(a)(2) include: termination date of the lease; amount of rent paid by lessee; value of sublease; legally allowable use/current use by lessee; and use or enjoyment by lessee.